

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.

Raymond GRANT

Case No. 25-30150

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 5, 2025 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm.

This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

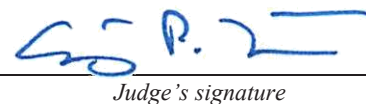
Date: March 17, 2025

City and state: Detroit, Michigan



*Complainant's signature*

Marquis Shannon, Special Agent - ATF  
*Printed name and title*



*Judge's signature*

Honorable Anthony P. Patti, U.S. Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Special Agent Marquis Shannon, being duly sworn and deposed, state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been employed with the ATF for nearly eleven years. As a Special Agent, I am currently assigned to the Detroit Field Office. I have conducted or participated in numerous criminal investigations focused on firearms and narcotics violations. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. Prior to my employment with ATF, I was employed as a State Trooper with the Ohio State Highway Patrol for approximately seven-and-a-half years from 2006 through 2014. I earned a bachelor's degree from the Ohio State University.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I am currently investigating Raymond GRANT, (D.O.B. XX/XX/1982) for federal firearms violations. As detailed below, there is probable cause to believe that GRANT knowingly possessed a firearm as a convicted felon, in violation of 18 U.S.C. § 922(g)(1).

### **PROBABLE CAUSE**

4. During the month of February 2025, the ATF has been investigating multi-convicted felon Raymond GRANT for federal firearms violations arising from a traffic stop conducted by Inkster Police Department (IPD) officers on February 5, 2025, in Inkster, Michigan.

5. On February 5, 2025, around 8:14 p.m., IPD officers were on patrol when they observed a white Chevrolet driving eastbound on Michigan Avenue. Officers watched as the Chevrolet crossed all lanes of traffic and entered the turn around to the westbound lanes on Michigan Avenue. The white Chevrolet failed to come to a complete stop and an officer also saw that the vehicle did not have a working license plate light. As officers attempted to conduct a traffic stop on the white Chevrolet, the vehicle continued westbound on Michigan Avenue at a slow rate of speed. The vehicle finally stopped at the second turn around toward the eastbound lanes of Michigan Avenue.

6. Once the vehicle stopped, an officer observed the driver of the white Chevrolet moving around, making quick movements inside the vehicle. As the officer began to exit his patrol car, the white Chevrolet drove off, driving through a

stop sign and on to eastbound Michigan Avenue. The vehicle was slow to stop, but eventually stopped at the Mona Lisa Motel parking lot.

7. After the vehicle stopped, an officer made contact with the vehicle's driver, later identified as GRANT. The officer asked GRANT for his driver's license, vehicle registration, and proof of insurance. GRANT provided his driver's license and vehicle registration but was unable to provide his proof of insurance. The officer returned to his patrol car and conducted a law enforcement inquiry of GRANT. The officer saw that GRANT had a warrant out of the Dearborn Police Department and had multiple previous contacts with law enforcement for narcotics violations. Meanwhile, the other officer contacted GRANT and waited by GRANT's driver's side window. Then, both officers met at GRANT's vehicle, and GRANT was asked to step out of the vehicle due to the pending warrant. The officer then asked GRANT for permission to search the white Chevrolet, and GRANT gave him consent to do so, as well as to search his person.

8. During a search of GRANT's car, one of the officers removed the cup holder from the center console, and found a loaded black Glock, Model 35, .40 caliber pistol with an attached machinegun conversion device (MCD), also known as a "Glock Switch." Next to the gun, the officer found a "drum" magazine loaded with .40 caliber ammunition. Also, during the search, officers found a clear, knotted plastic bag between the driver's seat and center console containing three individually folded lottery tickets. Based on his training and experience, the officer

knows that clear, knotted plastic bags containing individually folded lottery tickets are commonly used to transport narcotics for distribution. Grant also had about \$590 in U.S. currency on his person.

9. GRANT was placed under arrest and transported to the Inkster Police Department without incident and GRANT's vehicle was towed from the scene. A field test of the suspected narcotics showed a positive test for the presence of heroin.

10. During this investigation, I reviewed data from the National Crime Information Center (NCIC), showing GRANT was previously convicted of the following crimes that are punishable by more than a year of imprisonment:

- 2006 - Felony Firearm, Third Circuit Court of Michigan.
- 2010 - Attempted Controlled Substance Delivery Manufacturing - Cocaine/Heroin/ or Another Narcotic less than 50 grams, Third Circuit Court of Michigan.
- 2013 - Controlled Substance - Possession- Cocaine/Heroin/ or Another Narcotic less than 25 grams, Third Circuit Court of Michigan.
- 2015 - Controlled Substance -Possession - Cocaine/Heroin/ or Another Narcotic less than 25 grams, Third Circuit Court of Michigan.

- 2015 - Controlled Substance Delivery Manufacturing - Cocaine/Heroin/ or Another Narcotic less than 25 grams, Third Circuit Court of Michigan.
- 2017 - Controlled Substance Delivery Manufacturing - Cocaine/Heroin/ or Another Narcotic less than 50 grams, Third Circuit Court of Michigan.
- 2017 - Controlled Substance – Possession - Cocaine/Heroin/ or Another Narcotic less than 50 grams, Third Circuit Court of Michigan.
- 2019 - Controlled Substance Possession- Cocaine/Heroin/ or Another Narcotic less than 25 grams, Third Circuit Court of Michigan.
- 2021 – Attempted Controlled Substance Delivery Manufacturing - Cocaine/Heroin/ or Another Narcotic less than 50 grams, Third Circuit Court of Michigan.

11. As a part of my investigation, I also conducted a LEIN (Law Enforcement Information Network) inquiry of the Michigan license plate on GRANT's car, which showed the white Chevrolet was registered to Raymond GRANT on October 29, 2024, and expiring on October 15, 2025.

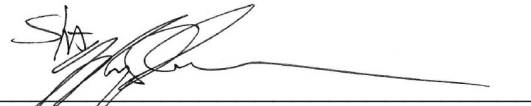
12. On February 26, 2025, I contacted ATF Interstate Nexus Expert and Special Agent Matthew Totten, regarding the status of the Glock, Model 35, .40 caliber, semiautomatic pistol, with an attached machinegun conversion device.

Special Agent Totten stated, based on the description provided and without conducting a physical examination, that the Glock, Model 35 firearm was manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

### **CONCLUSION**

13. There is probable cause that on or about February 5, 2025, in the Eastern District of Michigan, Raymond GRANT (XX/XX/1982), an individual convicted of multiple felonies, knowingly possessed a loaded Glock, Model 35, .40 caliber pistol, with an attached machinegun conversion device, that traveled in and affected interstate commerce in violation of Title 18 U.S.C. 922(g)(1).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marquis Shannon', written over a horizontal line.

Marquis Shannon, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read 'Hon. Anthony P. Patti', written over a horizontal line.

Hon. Anthony P. Patti  
United States Magistrate Judge

Date: March 17, 2025